

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

v.

COLLINS MURPHY et al.,

Defendants.

CASE NO. 7:20-CV-00947-DCC

DEFENDANTS MG FREESITES LTD AND MINDGEEK S.A.R.L'S
MOTION TO SEAL

Pursuant Local Civil Rule 5.03 of the United States District Court District of South Carolina, Defendants MG Freesites Ltd. and Mindgeek S.à r.l. (together, “Defendants”) hereby move the Court to seal Exhibits A and B to the Declaration of Marc E. Mayer and the unredacted Reply Memorandum of Law being filed in support of Defendants’ Motion to Compel Independent Medical Examinations pursuant to Rule 35 of the Federal Rule of Civil Procedure. These Exhibits and redacted material in the Reply Memorandum are either confidential documents pursuant to Paragraph 4 or contain confidential information pursuant to Paragraph 3 of the Confidentiality Order [E.C.F. 138] that require a court order to disclose.

In support of this Motion, Defendants submit the Memorandum in Support of Defendants’ Motion to Seal as required by Local Civil Rule 5.03. Pursuant to Section 13.4.3 of the Court’s Electronic Case Filing Policies and Procedures and Local Rule 7.02, Defendants’ counsel provided appropriate notice to counsel for Plaintiffs about Defendants’ need to file the foregoing confidential materials, and Plaintiffs’ counsel consented to filing such material under seal.

A non-confidential descriptive index of the documents Defendants seeks to file under seal is attached hereto as Exhibit A. Pursuant to Section 8.1 of the Court’s Electronic Case Filing

Policies and Procedures, copies of the documents that Defendants seek to seal through this Motion will be emailed to chambers for an *in-camera* review and shall not be filed on the docket.

By filing below, counsel certifies that he has complied with Local Civil Rule 5.03 in filing this Motion.

WHEREFORE, Defendants respectfully requests that the Court grant the instant Motion and allow the documents identified in the Index attached hereto as Exhibit A be filed under seal with the Court.

DATED: June 14, 2024

TURNER, PADGET, GRAHAM AND LANEY,
P.A.

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